

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ROBIN BRED A, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS,

Defendant.

Civil Action No. 1:16-cv-11512-DJC

**MOTION TO PRELIMINARILY APPROVE THE PARTIES’
CLASS ACTION SETTLEMENT**

Plaintiff Robin Breda (“Plaintiff”) respectfully moves for entry of an Order granting preliminary approval of the class action settlement between Plaintiff and Defendant Cellco Partnership d/b/a Verizon Wireless (“Defendant” or “Verizon”).

Plaintiff asks that the Court enter the Preliminary Approval Order attached hereto as Exhibit A to (i) conditionally certify the Settlement Class for purposes of settlement; (ii) appoint Plaintiff as the Class Plaintiff; (iii) appoint Plaintiff’s counsel as Class Counsel; (iv) preliminarily approve the terms of the Settlement Agreement; (v) approve the form, content and method of delivering notice to the Settlement Class as set out in the Settlement Agreement as “the best notice that is practicable under the circumstances” (Fed. R. Civ. P. 23(c)(2)(B)); and (vi) schedule a Final Approval hearing in accordance with the deadlines proposed in the Settlement Agreement and paragraph 18 of the Preliminary Approval Order.

In support, Plaintiff submits the accompanying Memorandum of Law in Support of Motion for Preliminary Approve Class Action Settlement, the Settlement Agreement and its exhibits (1-5), and the Declarations from proposed Class Counsel.

For the reasons set forth in the accompanying memorandum, Plaintiff requests that the Court enter the Preliminary Approval Order in the form attached as Exhibit A¹.

Dated: October 7, 2021

Respectfully Submitted,

ROBIN BREDÁ,
By her attorneys,

/s/ Sergei Lemberg

Sergei Lemberg (BBO#650671)
Stephen Taylor (Pro Hac Vice)
Lemberg Law LLC
43 Danbury Road
Wilton, CT 06897
203.653.2250 x5500 (office)
203.653.3425 (fax)
slemberg@lemborglaw.com

-and-

/s/ Keith J. Keogh

Keith J. Keogh (Pro Hac Vice)
Timothy J. Sostrin (Pro Hac Vice)
Keogh Law, Ltd.
55 W. Monroe St., Suite 3390
Chicago, Illinois 60603
312.726.1092 (office)
312.726.1093 (fax)
keith@keoghlaw.com

¹ This is the same proposed order attached as Exhibit 5 to the Settlement Agreement and attached herto for the Court's convenience.

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2021, I served a true and accurate copy of the foregoing to counsel of record through the Court's CM/ECF system which sent notice of such filing to all counsel of record.

/s/ Keith J. Keogh

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